

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Kanye WOODS

Case: 2:24-mj-30356
Assigned To : Unassigned
Assign. Date : 8/21/2024
Description: COMP USA V. WOODS
(KB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 20, 2024 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 922(g)(1)	Felon in possession of a Firearm
18 U.S.C. § 922(o)	illegal possession of a machinegun

This criminal complaint is based on these facts:


See attached Affidavit

☐ Continued on the attached sheet.


Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: August 21, 2024

City and state: Detroit, MI


Complainant's signature

Sami Rasmussen, Special Agent ATF
Printed name and title


Judge's signature

Hon. Anthony P. Patti U.S. Magistrate Judge
Printed name and title

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

1. I, Samantha Brockmiller-Rasmussen, being first duly sworn,
hereby state:

INTRODUCTION

2. I am an “investigative or law enforcement officer of the United States” within the meaning of Section 2510(7) of Title 18, United States Code, that is, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Section 2516, Title 18, United States Code. I have been employed by the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), United States Department of Justice, as a Special Agent since December of 2023. I completed the Federal Law Enforcement Training Center Criminal Investigator Training Program and the ATF Special Agent Basic Training Program in Glynco, Georgia.

3. Prior to becoming a Special Agent with ATF, I was an Intelligence Analyst with the Oakland County Sheriff's Office for approximately one year. I obtained a Master of Science degree in

Criminology and a Bachelor of Science degree majoring in Criminology and Criminal Justice and Psychology from Florida State University.

4. I am a Special Agent in Group IV, which is responsible for conducting investigations related to violent crime and/or gangs. During my employment, I, and Agents assigned to this investigation, have conducted and/or participated in numerous criminal investigations involving the illegal possession, use, and sale of firearms, drug trafficking violations, fraud, and criminal street gangs.

5. This affidavit is made in support of an application for a criminal complaint for Kanye WOODS, a/k/a "Jalin Thomas Woods," a/k/a "Glizzy."

6. I have probable cause to believe that WOODS, who knew he was a convicted felon, knowingly possessed a firearm, which traveled in interstate commerce, in violation of 18 U.S.C. § 922(g)(1). Additionally, WOODS possessed a machinegun conversion device ("MCD"), in violation of 18 U.S.C. § 922(o).

7. I make this affidavit based on my participation in this investigation, interviews conducted by myself and other law enforcement agents, reports from other law enforcement agents, communications with

others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience.

8. The information in this affidavit is for the limited purpose of establishing probable cause and does not contain all details or all facts relating to this investigation.

PROBABLE CAUSE

9. On August 19, 2024, I obtained a federal search warrant for Kanye WOODS's residence located in Detroit, Michigan. On August 20, 2024, the ATF Special Response Team ("SRT") with assistance from ATF Agents, DOL-OIG, and the Detroit Police Department ("DPD") executed the warrant. WOODS was detained in the front living room of the residence. Two other individuals were encountered—one in the living room and the other in the driveway.

10. After the residence was secured, a systematic search was conducted. Agents found the following items in the southeast bedroom closet on the main floor, near where WOODS was found:

- a. One Glock, Model 23, .40 caliber pistol affixed with a light attachment and Machinegun Conversation Device (MCD).

The firearm was loaded with one .40 caliber round of ammunition in the chamber and an extended magazine with a purple baseplate loaded with seventeen rounds of .40 caliber ammunition.



11. Previously, ATF SA Mary Behler, DOL-OIG Colon, and I reviewed the Instagram profile associated with the Instagram vanity name “omertaglizzy_”, associated with KANYE WOODS. On multiple occasions, ATF agents viewed the publicly accessible portion of this Instagram account. I know “Glizzy”, which is part of the account’s handle, is a nickname for WOODS. I also know that “Omerta” is a reference to the Omerta Boyz, a violent street gang in Detroit. WOODS is believed to

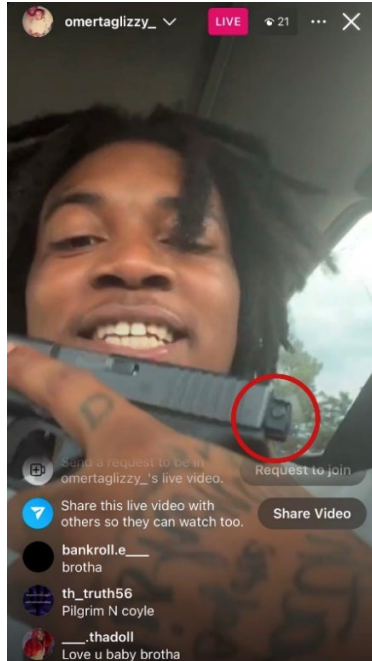
be a member of the gang. There are numerous photographs of WOODS on the Instagram page.

12. On August 13, 2024, I observed two live broadcasted videos from the account where WOODS held up a suspected Glock model pistol with a suspected Machinegun Conversion Device (commonly referred to as a “switch”) affixed to the slide and an extended magazine with a purple baseplate inserted into the magazine well.

13. Based on my training on MCDs and experience in previous MCD investigations and seizures, I know that a “Switch” is a colloquialism for an MCD aka a “Glock Switch.” A Glock Switch is a small device that replaces the back plate and typically protrudes from the back of the slide on a Glock pistol. When installed, the device applies pressure to the trigger bar and disables the firearm’s ability from limiting one round of ammunition to be fired per one trigger pull, making the firearm a machine gun. Additionally, an uninstalled Glock Switch, by itself, is a machinegun under Federal law.

14. During the live, WOODS vocally identifies the MCD by its colloquial name: “switch[y]”. During the portion of the video where

WOODS shows the switch to the camera, WOODS raps along to a song playing in the vehicle stating, “that’s why the switchy on my side.”



15. On or about August 18, 2024, I completed a review of surveillance footage at WOODS’s residence from the previous few days. WOODS was seen multiple times in possession of a firearm that bears a striking resemblance to the Glock firearm with MCD and extended magazine with purple baseplate found inside his residence.



16. Agents compared the firearm recovered during the Federal Search Warrant to the images of the firearm in WOODS's possession, both on surveillance and via Instagram live, and believe the firearm to be the same based on its unique characteristics

17. I reviewed WOODS's computerized criminal history and Michigan's Sixth Judicial Circuit Court records, which revealed the following felony conviction.

- a. On or about December 18, 2023, after his probation under the Holmes Youthful Trainee Act (HYTA) was revoked, WOODS was convicted of Felony Assaulting/Resisting/Obstructing Police (punishable by more than one year), in

the Sixth Judicial Circuit Court, Oakland County. WOODS was convicted under his alias, "Jalin Thomas WOODS." I reviewed MDOC records which confirmed that WOODS admitted to using the alias when he was arrested, but that Kanye Lamont WOODS is his given name. Because WOODS is a convicted felon, he is prohibited from possessing, purchasing, and manufacturing firearms.

18. On August 20, 2024, S/A Mary Behler, S/A Colon, and I conducted a recorded interview with WOODS. Agents advised WOODS of his Miranda Rights to which he acknowledged and agreed to speak with Agents without an attorney present. During the interview, WOODS acknowledged his HYTA probation had been revoked. In addition, I questioned WOODS about his knowledge of the "button" (street terminology for an MCD) that was affixed to the abovementioned Glock pistol. WOODS acknowledged knowing what a "button" was and informed Agents he obtained the firearm with the MCD attached.

19. On August 20, 2024, I contacted Special Agent Michael Jacobs, an ATF Interstate Nexus Expert, and provided him a

description of the firearm recovered. Based upon the description, Special Agent Jacobs advised that the firearm is a firearm as defined under 18 U.S.C. § 921. He also advised that the firearm was manufactured outside of the state of Michigan after 1898 and therefore had traveled in and affected interstate commerce.

20. ATF Industry Operations Investigator Gary Gray conducted a search of the ATF Firearms Licensing System (FLS), which maintains all records of NFA weapons (AOW, MCDs, machineguns, etc.) legally documented with the ATF. WOODS has not registered licenses to possess, manufacture, and or sell these types of firearms. WOODS is not authorized to possess NFA weapons which include machineguns, MCDs, and AOWs (Any Other Weapons).

CONCLUSION

21. Probable cause exists that Kanye WOODS, a prior convicted felon, was in possession of the above-described firearm and MCD. The recovered firearm has previously traveled in foreign or interstate commerce. Therefore, probable cause exists that Kanye WOODS committed violations of Titles 18 U.S.C. § 922(g)(1), and 18 U.S.C. § 922(o), within the Eastern District of Michigan.

Respectfully submitted,



Samantha Brockmiller-Rasmussen
Special Agent
Bureau of Alcohol, Tobacco, Firearms
and Explosives

Sworn to before me and signed in my
presence and/or by reliable electronic means.



HON. ANTHONY P. PATTI
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF MICHIGAN
Date: August 21, 2024